

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

Exhibit F

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION
CASE NO. 3:21-CV-03302-MBS-TJH-RMG

THE SOUTH CAROLINA STATE CONFERENCE OF
THE NAACP, AND TAIWAN SCOTT, ON BEHALF
OF HIMSELF AND ALL OTHER SIMILARLY
SITUATED PERSONS,

Plaintiffs,

vs.

THOMAS C. ALEXANDER, HENRY D. MCMASTER,
IN HIS OFFICIAL CAPACITY AS GOVERNOR OF
SOUTH CAROLINA; HARVEY PEELER, IN HIS
OFFICIAL CAPACITY AS PRESIDENT OF THE
SENATE; LUKE A. RANKIN, IN HIS OFFICIAL
CAPACITY AS CHAIRMAN OF THE SENATE
JUDICIARY COMMITTEE; JAMES H. LUCAS, IN
HIS OFFICIAL CAPACITY AS SPEAKER OF THE
HOUSE OF REPRESENTATIVES; CHRIS MURPHY,
IN HIS OFFICIAL CAPACITY AS CHAIRMAN OF
THE HOUSE OF REPRESENTATIVES JUDICIARY
COMMITTEE; WALLACE H. JORDAN, IN HIS
OFFICIAL CAPACITY AS CHAIRMAN OF THE
HOUSE OF REPRESENTATIVES ELECTIONS LAW
SUBCOMMITTEE; HOWARD KNABB, IN HIS
OFFICIAL CAPACITY AS INTERIM EXECUTIVE
DIRECTOR OF THE SOUTH CAROLINA STATE
ELECTION COMMISSION; JOHN WELLS, JOANNE
DAY, CLIFFORD J. ELDER, LINDA MCCALL,
AND SCOTT MOSELEY, IN THEIR OFFICIAL
CAPACITIES AS MEMBERS OF THE SOUTH
CAROLINA STATE ELECTION COMMISSION,

Defendants.

DEPOSITION OF: ANDREW THEODORE FIFFICK
(Appearing via VTC)

DATE: July 21, 2022

TIME: 10:10 a.m.

1 ask you not to do it. That was sort of a -- like I
2 said, I would call that a postulate.

3 Q. Were you ever instructed as a criteria
4 to make a 6-1 Republican-leaning map?

5 A. A one -- make one lean Republican?

6 Q. Make six lean Republican, one not --

7 A. I don't recall --

8 Q. -- districts?

9 A. No, I don't recall ever having anybody
10 ask me to do that. But it's all a matter of
11 semantics. I mean, you can number anything you
12 want. You can change the numbers. You can swap
13 the numbers, the 1st on the 6th, the 6th for the
14 1st. But no, no one ever asked me.

15 Q. So it was not your understanding that
16 you were driven or members were driven to create a
17 congressional map where six districts based upon
18 political data or some other information suggested
19 that they would likely vote for Republican
20 candidates as compared to one district that would
21 likely vote for Democratic candidates? That was
22 not something that guided the work that you were
23 aware was being done in the congressional mapping?

24 A. Again, that was the whole context --

25 Q. Yes, it was long. It got narrative.